

December 10, 2012

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: *Developing a Unified Intercarrier Compensation Regime, et al.*,  
CC Docket Nos. 01-92 and 96-45, WC Docket Nos. 03-109, 05-  
337, 07-135 and 10-90, WT Docket No. 10-208, and GN Docket  
No. 09-51 – Notice of Ex Parte Communication

Dear Ms. Dortch:

On Thursday, December 6, 2012, Anand Vadapalli, Leonard Steinberg and Richard Cameron of Alaska Communications Systems Group, Inc. (“ACS”) and I met with Commissioner Rosenworcel and Priscilla Argeris and discussed the Commission’s Phase I Connect America Fund (“CAF”) program.

In particular, ACS described how some aspects of the rules governing incremental Phase I CAF support make it impracticable for ACS to use much of the support as intended under the Commission’s *CAF-ICC Transformation Order*. ACS also expressed concern that Commission restrictions on the use of frozen Phase I CAF support will make it difficult in future years for eligible telecommunications carriers (“ETCs”) such as the ACS operating local exchange carrier (“LEC”) subsidiaries to demonstrate compliance with the requirement to devote a substantial portion of that support to building and operating broadband-capable networks.

ACS described its pending waiver petition for greater flexibility in deploying broadband using incremental Phase I CAF support. ACS also expressed support for changes to the Commission’s rules so that further funding rounds for incremental Phase I CAF support can more effectively be used to bridge the broadband availability gap in high-cost areas served by price cap carriers such as the ACS LECs. ACS opined that additional rule waivers may be required if LECs are to use frozen Phase I CAF support efficiently for maximum benefits to consumers in ACS’s service

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territories. ACS also noted that substantial resources have been required for LECs to comply with the *CAF-ICC Transformation Order* and the rules adopted thereunder and in subsequent orders in these proceedings.

The substance of ACS's remarks may be found in ACS's pending waiver petition in the above-captioned dockets as well as ACS's prior *ex parte* filings in these proceedings. Please direct any questions regarding this matter to me.

Very truly yours,

/s/

Karen Brinkmann

*Counsel to Alaska Communications Systems  
Group, Inc.*

cc: Hon. Jessica Rosenworcel  
Priscilla Argeris